

COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

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Investigation by the Department of Telecommunications and )

Energy on its own motion pursuant to G.L. c. 159, §§12 and 16, ) D.T.E. 01-34

into Verizon New England Inc., d/b/a Verizon Massachusetts' )

provision of Special Access Services. )

)

PETITION TO INTERVENE OF

CONVERSENT COMMUNICATIONS OF MASSACHUSETTS, LLC

Pursuant to 220 C.M.R. §1.03(1), Conversent Communications of Massachusetts, LLC ("Conversent") hereby petitions the Department of Telecommunications and Energy (the "Department") for leave to intervene as a party in this proceeding. Conversent's principal offices are located at 313 Boston Post Road West, Suite 140, Marlborough, Massachusetts 01752. As grounds for its Petition, Conversent states as follows:

1. Conversent is authorized to provide local, intraLATA and interLATA services in Massachusetts. Conversent competes with Verizon New England, Inc., d/b/a Verizon Massachusetts ("Verizon") in the provision of certain intraLATA telecommunications services in Massachusetts and will, if Verizon is granted authority to provide in-region interLATA services in Massachusetts, compete with Verizon in the provision of these services as well.

2. Conversent purchases substantial volumes of special services from Verizon, including special access and unbundled DS-1 loops and interoffice transport. Conversent and its customers have been adversely affected by Verizon's chronic problems in provisioning, maintaining and repairing these special services.

3. As both a customer and a competitor of Verizon, Conversent has an interest in

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receiving just, reasonable and nondiscriminatory treatment from Verizon with respect to the special services Conversent purchases; Conversent seeks to protect that interest by participating herein.

4. For the foregoing reasons, Conversent will be substantially and specifically affected by the Department's review and decision in this docket.

5. Conversent intends to fully participate in the proceedings in this docket and may, as necessary, conduct discovery, present witnesses, cross-examine witnesses, present legal arguments, file briefs, etc. to protect its interests.

WHEREFORE, Conversent respectfully requests leave to intervene in this proceeding.

Respectfully submitted,

Conversent Communications of Massachusetts, LLC

By its attorneys,

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Scott Sawyer

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Providence, RI 02903

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Dated: March 28, 2001

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CERTIFICATE OF SERVICE

I hereby certify that on this day, served the foregoing upon each person designated on the attached service list by either first class mail, postage prepaid or by overnight courier.